

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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L.B., individually and on behalf of her  
minor child, Kyle, proceeding under a  
pseudonym,

Plaintiffd,

- against -

The City of New York; Jess Dannhauser, in  
his official capacity as Commissioner,  
Administration for Children's Services of  
the City of New York ("ACS"); Ariel  
Semper, Nadine Cenord, Bernadette Jean-  
Louis, Donna McFadden, Ana Costa,  
Taiesha Coleman, and Leydi Taveras, each  
individually and in their official capacity as  
ACS Child Protective Specialists,

Defendants.

**NOTICE OF PARTIAL  
MOTION TO DISMISS  
THE AMENDED  
COMPLAINT**

1:23-cv-8501 (RPK) (JRC)

-----X  
  
**PLEASE TAKE NOTICE** that Defendants City of New York, Jess Dannhauser,  
in his official capacity as Commissioner of the Administration for Children's Services of the City  
of New York as well as Defendants Ariel Semper, Nadine Cenord, Bernadet Jean-Louis, Donna  
McFadden, Ana Costa, Taiesha Coleman, and Leydi Taveras individually and in their official  
capacity as ACS Child Protective Specialists will move this Court before the Honorable Rachel  
P. Kovner, United States District Judge, at the United States Courthouse for the Eastern District  
of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time  
to be determined by the Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure,  
dismissing plaintiff's certain claims in the Amended Complaint against Defendants and for such  
other and further relief as the Court may deem just and proper.

Dated: New York, New York  
May 22, 2024

HON. SYLVIA HINDS-RADIX  
Corporation Counsel of the  
City of New York  
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By: /s/ Daniel R. Perez  
Daniel R. Perez  
Assistant Corporation Counsel

To: All Counsel of Record via ECF